SUPREME COURT, U. S.

FILED

JOHN F. DAVIS, CLERK

IN THE

Supreme Court of the United States

OCTOBER TERM, 1967

No. 818

TRANSCONTINENTAL BUS SYSTEM, INC., ET AL.,
Petitioners,

v.

CIVIL AERONAUTICS BOARD, *Respondent.*

On Petition for a Writ of Certiorari to the
United States Court of Appeals
for the Fifth Circuit

BRIEF AMICUS CURIAE IN SUPPORT OF PETITIONERS BY THE NATIONAL ASSOCIATION OF MOTOR BUS OWNERS

FREDERICK S. [illegible]
STEPTOE & JOHNSON
1250 Connecticut Ave., N.W.
Washington, D. C. 20036

Rule of Byron S. Adams Printing, Inc., Washington, D.C.

IN THE

Supreme Court of the United States

OCTOBER TERM, 1967

No. 818

TRANSCONTINENTAL BUS SYSTEM, INC., ET AL.,
Petitioners,

v.

CIVIL AERONAUTICS BOARD, *Respondent.*

On Petition for a Writ of Certiorari to the United States Court of Appeals For the Fifth Circuit

---

BRIEF AMICUS CURIAE IN SUPPORT OF PETITIONERS BY THE NATIONAL ASSOCIATION OF MOTOR BUS OWNERS

The National Association of Motor Bus Owners with the consent of petitioners and respondent (See Appendix) joins with the Petitioner in requesting that the petition for writ of certiorari to the United States Court of Appeals for the Fifth Circuit be granted in the above-captioned case.

INTEREST

1. The National Association of Motor Bus Owners is a nonprofit corporation, organized and existing under the laws of the District of Columbia with its principal office at 839 17th Street, N.W., Washington, D. C. It is the national association for the intercity motor bus industry and its membership includes the Greyhound system and the National Trailways system of bus operators. It represents approximately 1,000 motor bus carriers which collectively conduct operations throughout the United States. Its members are actively engaged in the transportation of passengers and package express by motor bus under the jurisdiction and regulation of the Interstate Commerce Commission.

2. As an authorized representative of surface transportation in the motor carrier industry, the National Association of Motor Bus Owners has a distinct and unique interest in this case.

ARGUMENT

The National Association of Motor Bus Owners hereby incorporates and supports the Petition for a Writ of Certiorari filed by the Petitioners, Trans-Continental Bus System, Inc. et al., for the reasons therein set out.

CONCLUSION

For the foregoing reasons it is submitted that the Court should grant the Petitioners' Writ of Certiorari.

Respectfully submitted,

FREDERICK S. HILL

APPENDIX

LAW OFFICES
BOBOS & LESTER
BENDER BUILDING
1120 CONNECTICUT AVENUE, N.W.
WASHINGTON, D. C. 20036

December 20, 1967

George C. Cochran, Esq.
Steptoe & Johnson
1250 Connecticut Avenue, N.W.
Washington, D. C. 20036

Dear Mr. Cochran:

On behalf of Transcontinental Bus Systems, Inc., we are writing to confirm that we have long been interested in having the support of NAMBO, and in this regard welcome your suggestion that you file a Brief Amicus in *Transcontinental Bus Systems, Inc.* v. *Civil Aeronautics Board* before the Supreme Court.

Sincerely,

ROBERT C. LESTER
Robert C. Lester

cc: Warren Goff, Esq.

OFFICE OF THE SOLICITOR GENERAL
WASHINGTON, D. C. 20530

December 13, 1967

George C. Cochran, Esq.
Steptoe & Johnson
1250 Connecticut Avenue, N.W.
Washington, D. C. 20036

Re: Transcontinental Bus Systems, Inc.
v. Civil Aeronautics Board (No. 818)

Dear Mr. Cochran:

In reply to your letter of December 13, 1967, I am pleased to advise you that the United States consents to your filing a brief *amicus curiae* in the above-captioned case on behalf of the National Association of Motor Bus Owners.

Very truly yours,

ERWIN N. GRISWOLD
Erwin N. Griswold
Solicitor General